



May 24, 2019

VIA ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

RE: Notice of Ex Parte Presentation, *In the Matter of 2018 Quadrennial Regulatory Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of The Telecommunications Act of 1996, Docket No. 18-349*

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission’s rules, 47 C.F.R. § 1.1206, Writers Guild of America, West, Inc. (“WGAW”) submits this letter summarizing the following meetings that WGAW Political and Legislative Director Corrina Freedman, WGAW Senior Research & Policy Analyst Garrett Andrew Schneider and WGAW DC Representative Michael Forscey of Forscey PLLC, had on Thursday May 23, 2019:

- A meeting with Commissioner Rosenworcel and Jessica Martinez, Special Advisor and Confidential Assistant; and
- A meeting with Michael Scurato, Legal Advisor for Media and Consumer Protection, Office of Commissioner Starks

In the meetings, WGAW representatives expressed opposition to any action by the FCC to repeal or weaken the Dual Network Rule, which currently prevents common ownership of any two of the four major broadcast networks. Despite changes to the video distribution ecosystem, broadcast networks continue to provide uniquely popular and profitable programming as well as professional news content, and do so using public airwaves. The privilege of profiting from free

use of a scarce public resource obligates broadcast networks and stations to a variety of special restrictions and obligations to serve the public interest.

Guild representatives explained that despite growth in online video and online access to news, broadcast television continues to offer a valuable product without substitutes in key areas. Despite frequent claims that the broadcast market is no longer unique, the number of homes receiving broadcast programming over-the-air has increased substantially in the past several years, attesting to the ongoing need for protections related to broadcast transmission. In addition, in contrast to broadcast, online streaming services do not offer original or local news programming.

In particular, Guild representatives explained that removing the protections of the Dual Network Rule would enable harmful consolidation. Horizontal and vertical mergers have given a small handful of companies almost complete control over the programming seen by American television audiences, diminishing diversity and choice. A merger among the four major broadcast networks would further diminish media plurality in this valuable market. The FCC has an obligation to uphold the public interest in an open and pluralistic broadcast system, and should support this obligation by retaining the Dual Network Rule.

Sincerely,

/s/

Corrina Freedman
Political and Legislative Director
Writers Guild of America, West, Inc.

cc: Commissioner Jessica Rosenworcel
Jessica Martinez
Michael Scurato